

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: BRITTNEY DANIELLE BROWN, Debtor

**Case No. 18-04128-KMS
CHAPTER 13**

MOTION TO INCUR NEW DEBT

COMES NOW, Debtor, by and through counsel, and moves this Court to allow Debtor to incur new debt, and in support thereof, would show the Court as follows:

1.

Debtor filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code on October 25, 2018.

2.

Debtor wishes to pursue a bachelor's degree in nursing (BSN). Debtor currently has an associate's degree in nursing (ADN). The BSN will allow for more career growth.

3.

Debtor is paying approximately 0% to General Unsecured Debts through the plan.

4.

Debtor wishes to borrow twelve thousand dollars (\$12,000.00) in student loans to pursue her BSN. Debtor will pay this debt to the lender direct pursuant to the terms of the agreement with the lender.

WHEREFORE, Debtor prays for an Order granting the above requested relief and any additional relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.

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CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the foregoing was forwarded on May 6, 2019, to the creditor, case trustee and U.S. Trustee as indicated in the "21 day notice" that accompanies this Motion.

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr.